



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

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COMMISSIONER

August 29, 2002

VIA EMAIL AND U.S. MAIL

Jeffrey F. Jones, Esq.  
Kenneth W. Salinger, Esq.  
Jay E. Gruber, Esq.  
Palmer & Dodge, LLP  
111 Huntington Avenue  
Boston, MA 02199-7613

Re: D.T.E. 01-31-Phase II (Track A)  
D.T.E.'s First Set of Information Requests to AT&T

Dear Messrs. Jones, Salinger, and Gruber:

Enclosed please find the first set of questions to AT&T Communications of New England, Inc. issued by the Department in the above-captioned matter. Please submit AT&T's responses to the Department and the parties in hard copy and by email on or before 5:00 p.m., Monday, September 9, 2002. Should you have any questions, please contact me at (617) 305-3608.

Sincerely,

Paula Foley  
Hearing Officer

Encs.

cc: DTE 01-31-Phase II service list (w/encs.)

INSTRUCTIONS FOR RESPONSES TO INFORMATION REQUESTS OF THE  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to AT&T Communications of New England, Inc. the following Information Requests.

**Instructions**

The following instructions apply to the Information Requests issued to all parties in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the petitioner or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:  
  
Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term "document" is used in the broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, and on all Department staff and parties; and submit two (2) copies of the responses to Paula Foley, Hearing Officer.

QUESTIONS TO AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

D.T.E. 01-31-Phase II (Track A)

August 29, 2002

1. Please specify and list the retail business services that AT&T considers to be contestable using UNEs and those it doesn't consider to be contestable using UNEs. Also please explain why the retail business services Verizon has listed in Tab C of its June 5, 2002 Compliance Filing are not contestable using the relevant UNEs as listed by Verizon.
2. See AT&T Comments at 10: Is the purpose of a price floor for Verizon's retail business services to prevent Verizon from conducting a "price squeeze" where it provides a retail service at a price below what it costs its competitors to obtain the inputs to provide a competing service? Please explain AT&T's position that the relevant price floor must reflect "the cost that Verizon itself incurs in the provision of the service," rather than the cost of the UNEs a competitor needs to purchase from Verizon to provide a competing service.